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<u>**VIA CM/ECF**</u>

November 15, 2022

The Honorable Beth P. Gesner
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

　　　　Re: *United States v. Mark Unkenholz*
　　　　　　Criminal Case No. SAG-22-0105

Dear Judge Gesner:

　　　　I write to request a modification of Mr. Unkenholz's pretrial release conditions by permitting him to travel to travel to Hawaii with his family from January 10-17, 2023, for a memorial service for his mother-in-law. The government, Assistant U.S. Attorney Kathleen Gavin, does not object to the proposed modification. U.S. Pretrial Officer Chandra Wageman, Mr. Unkenholz's supervising officer in Washington, also does not object to the proposed modification.

　　　　As the Court knows, Mr. Unkenholz first appeared before the Court on March 31, 2022, and was released on conditions, including a condition restricting his travel to Maryland and Washington State, where Mr. Unkenholz currently resides with members of his family. *See* ECF No. 12. Mr. Unkenholz's mother-in-law passed away in September. The family has planned a memorial service for her in Hawaii, where she lived with Mr. Unkenholz's wife during her childhood.

　　　　Accordingly, Mr. Unkenholz respectfully requests that the Court grant the unopposed request to modify his release conditions by permitting him to travel to Hawaii with his family from January 10-17, 2023, for a memorial service for his mother-in-law. All other conditions would remain in effect. I thank the Court for its attention to this matter.

Sincerely,

/s/

Shari Silver Derrow
Assistant Federal Public Defender

APPROVED this _____ day of November, 2022,

_____
Honorable Beth P. Gesner
United States Magistrate Judge